

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

3V, INC., a Delaware Corporation,)
Plaintiff,)
v.) C.A. No. 06-00593-JJF
CIBA SPECIALTY CHEMICALS)
CORPORATION, a Delaware Corporation,)
Defendant.)

CIBA SPECIALTY CHEMICALS)
CORPORATION, a Delaware Corporation,)
Plaintiff,) C.A. No. 06-672-JJF
v.)
3V, INC., a Delaware Corporation,)
Defendant.)

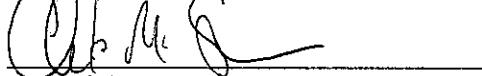
CIBA SPECIALTY CHEMICALS)
CORPORATION, a Delaware Corporation,)
Cross-Plaintiff,) C.A. No. 06-00629-JJF
v.)
3V, INC., a Delaware Corporation,)
Cross-Defendant.)

**NOTICE OF CIBA'S MOTION FOR LEAVE OF
COURT TO SERVE LIMITED DISCOVERY RELATING TO
3V'S DISCLAIMER OF ITS PATENT CLAIMS**

To: Joseph Grey
Stevens & Lee
1105 North Market Street, 7th Floor
Wilmington, DE 19801

Angelica M. Colwell
Nexsen Pruet, LLC
205 King Street, Suite 400
Charleston, SC 29401

PLEASE TAKE NOTICE THAT CIBA Specialty Chemicals Corporation's Motion Seeking Leave of Court to Serve Limited Discovery Relating to 3V's Discovery of its Patent Claims, dated April 15, 2008, shall be presented to the Court on June 6, 2008 at 10:00 a.m., or as soon thereafter as counsel may be heard.



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Counsel for CIBA Specialty Chemicals Corporation

Of Counsel:

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Brion Heaney

Richard J. Traverso

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2200 Clarendon Boulevard

Suite 1400

Arlington, VA 22201

(703) 312-5305

Dated: April 16, 2008

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**CIBA'S MOTION FOR LEAVE OF COURT TO SERVE LIMITED DISCOVERY
RELATING TO 3V'S DISCLAIMER OF ITS PATENT CLAIMS**

CIBA Specialty Chemicals Corporation ("CIBA") hereby moves for leave of Court to serve limited discovery on 3V, Inc. ("3V") relating to 3V's disclaimer of its patent claims.

The grounds for this Motion are fully set forth in the CIBA's opening brief, which is being filed contemporaneously with this Motion.



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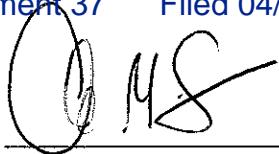
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**CERTIFICATION PURSUANT TO DISTRICT COURT
OF DELAWARE LOCAL RULE 7.1.1.**

Pursuant to Local Rule 7.1.1., the undersigned counsel for CIBA Specialty Chemicals Corporation certifies that 3V, Inc. opposes the relief sought by this Motion.



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Corporation*

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Dated: April 16, 2008

CERTIFICATE OF SERVICE

I hereby certify that on April 16, 2008, I electronically filed the foregoing with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following and which has also been served as noted:

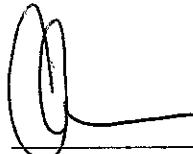
BY HAND

Joseph Grey
Stevens & Lee
1105 North Market Street
7th Floor
Wilmington, DE 19801

I hereby certify that on April 16, 2008, I sent the foregoing document by Federal Express, to the following non-registered participants:

Angelica M. Colwell
Nexsen Pruet, LLC
205 King Street, Suite 400
Charleston, SC 29401

Sara Centioni Kanos
201 W. McBee Avenue, Suite 400
Greenville, SC 29601



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ORDER

THE COURT, having considered CIBA Specialty Chemicals Corporation's Motion
For Leave of Court to Serve Limited Discovery Relating to 3V's Disclaimer of its Patent
Claims, and the parties' positions related thereto,

IT IS HEREBY ORDERED this ____ day of June 2008 that the Motion is GRANTED and that:

- A. 3V, Inc. shall be required to respond to the discovery attached to CIBA's opening brief in support of the Motion;
- B. 3V shall have ten (10) days to respond to such discovery; and
- C. CIBA shall be permitted to take a 30(b)(6) deposition of 3V, Inc. relating to 3V's decision to disclaim its claims on the patents at issue; said deposition to occur within thirty (30) days of this Order.

United States District Court Judge